

**Enbridge Line 6B MP 608
Marshall, MI Pipeline Release**

Transfer of Operations from Site A to Frac Tank City

Prepared for United States Environmental Protection Agency

**Enbridge Energy, Limited Partnership
Prepared: April 18, 2011
Revised May 13, 2011**

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Enbridge Energy, Limited Partnership
Line 6B Incident, Marshall, Michigan
May 13, 2011**

Introduction

The following plan has been developed to outline the intent and execution of the combining of the two support facilities Site A and Frac Tank City (FTC). The plan is intended to provide a summary of the initial activities performed at the two temporary waste handling facilities used for the Line 6B Incident and the proposed phased transfer of functions from Site A to FTC. This will be accomplished in a three-phased approach guided by the findings of the river reassessment. The completion of each phase of work and decision to progress to the next phase will be agreed upon by Enbridge Energy, Limited Partnership (Enbridge), United States Environmental Protection Agency (USEPA) and Michigan Department of Environmental Quality (MDEQ). A confirmatory email will be sent from Enbridge to USEPA and MDEQ when the next phase will begin.

History

Site A is used for solid waste and soil staging while FTC is used for liquid staging. At the peak of the release the two facilities were necessary to handle the extensive quantity of soils, sediments, and oily water.

The current and near-term forecasts of clean-up activities do not warrant the ongoing operation and maintenance of both Site A and FTC facilities. The decision to decommission (i.e. remove from service) Site A and to retain FTC was based on the ability of FTC to support all necessary functions of current and projected response activities.

The intent of the plan is to transfer all operations currently performed at Site A to either existing facilities at FTC and/or newly created facilities at FTC. This will be conducted in a phased approach such that no operational capacity at Site A will be omitted prior to transferring the task to FTC.

The implementation of this plan will reduce the overall footprint of the Line 6B Incident support facilities. Specific benefits will include:

- A significant reduction in waste water collection and disposal from precipitation events.
- Large reduction in trucking from liquid disposal.
- Reduce impacts to local wildlife and the environment.
- Improved operational efficiency with the use of 1 centralized facility.
- Restoration of Site A property.

Current Conditions

The following outlines the current activities at both Site A and Frac Tank City. See Figures 1 and 2 attached.

Site A

- Soil and debris staging cells
 - Cell 2: Active, proposed for decommissioning
 - Cell 4: Active
 - Cell 5: Active

- Cells 1, 3, 6, 7, 8: Decommissioned
- Decontamination Areas: In the process of being decommissioned
- Oily debris roll off(s)
- Equipment staging

Frac Tank City

- Decontamination Areas(2)
 - The northern decontamination pad is currently inactive.
- The southern pad is active.
- Roll offs
 - Control point oily debris roll off
- Household debris roll offs
- Truck Lining Station
 - Relocated to FTC from Site A
- Frac Tank Water Storage (Figures 2 and 3)
- Equipment Staging (yellow iron, boom, frac tanks, etc...)

Transfer of Functions

Enbridge operations is planning a phased approach in the transfer of functions from Site A to FTC. This will be a 3 phased approach guided by the findings of the reassessment of the Kalamazoo River and Talmadge Creek

Phase I

Assure all operational functions can be performed by FTC including soil staging, liquid staging and decontamination activities then constructed.

FTC Activities

- 1.) Consolidate all water storage to Frac Tanks at FTC.
- 2.) Transfer truck lining station from Site A to FTC.
- 3.) Transform northern decon pad at FTC to 2 soil staging cells with the capacity to hold approximately 2,000 cubic yards each (Figure 3 – Future Layout).
- 4.) Implement Traffic Management Protocol (Figure 3) includes:
 - Traffic flow
 - Signage

Site A Activities

- 1.) Decommission decon pads at Site A in accordance with the Soil Staging, Decontamination and River Access Site Closure Plan (Attachment A).

Phase II

The second phase of the plan further transfers the functions of Site A to FTC. As previously indicated, the decision to move to Phase II will be agreed upon by Enbridge, USEPA and MDEQ prior to implementation.

FTC Activities

- 1.) All solid waste staging will occur at FTC.
- 2.) All liquid waste staging will occur at FTC.
- 3.) Continue the transformation of FTC to the primary equipment storage area.

Site A Activities

- 1.) Decommission Cell 2 at Site A. The decommissioning of Cell 2 will be done in accordance with the Soil Staging, Decontamination and River Access Site Closure Plan.
- 2.) Cells 4 and 5 will be maintained at Site A.

Phase III

The third phase of the plan pertains to the decommissioning of Site A. This will be dictated by the conclusions made from the results of the reassessment.

The findings of the river reassessment will provide sufficient information for Enbridge, EPA, and DEQ to determine the necessary waste capacity for future activities and thus the need for Site A. However, if approval to direct-load and dispose of soil and debris is obtained, the need for the soil storage capacity of Site A will be greatly reduced. If either or both of the above conditions are satisfied, the following actions will take place:

FTC Activities

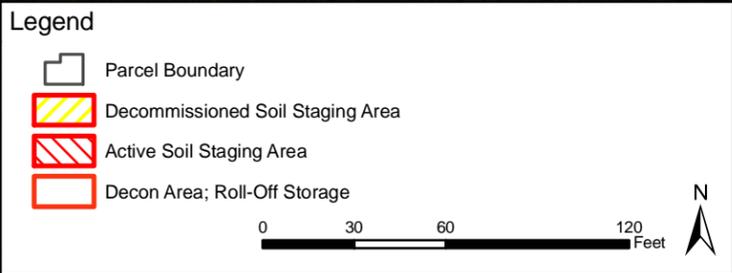
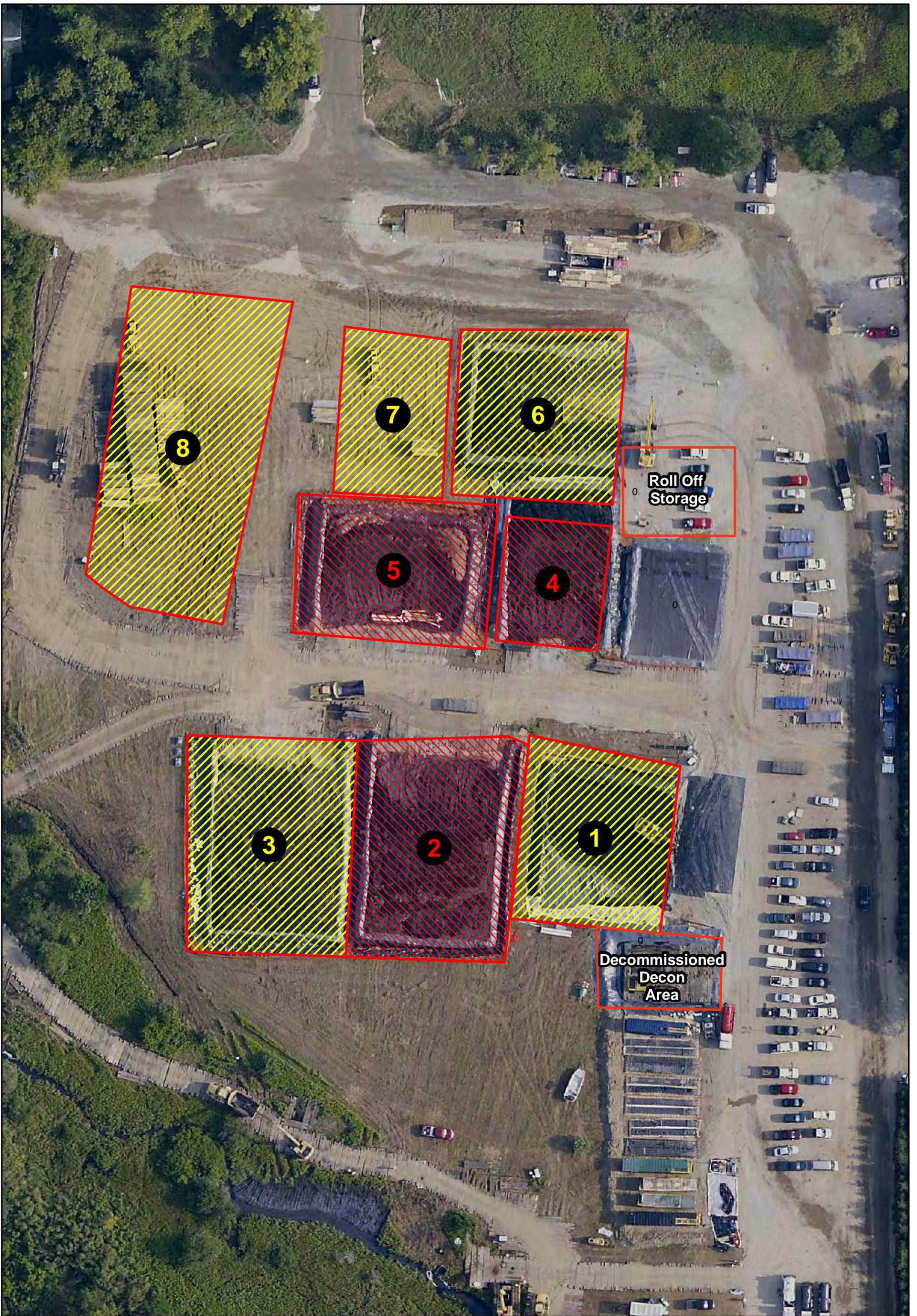
- 1.) All waste staging activities will occur at FTC as laid out in Figure 3.

Site A Activities

- 1.) Decommission Cells 4 and 5 in Site A in accordance with the Soil Staging, Decontamination and River Access Site Closure Plan.
- 2.) Remove all associated mat roads in Site A in accordance with the Talmadge Creek Swamp Mat Removal Sampling Plan (Attachment B).
- 3.) Restore the area to its original condition.

Closing

Upon completion of the three phases, FTC will be capable of handling all operational functions currently handled at both locations. FTC will remain in operation until the determination is made that it is no longer needed. This determination will be agreed upon by Enbridge, USEPA and MDEQ. All decommissioning activities will be conducted in accordance with the Enbridge Line 6B MP 608 Pipeline Release - Marshall, Michigan Soil Staging, Decontamination and River Access Site Closure Plan.



**Figure 1:
SITE A
CURRENT LAYOUT**

**ENBRIDGE LINE 6B M 608
PIPELINE RELEASE
MARSHALL, MI**

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Legend

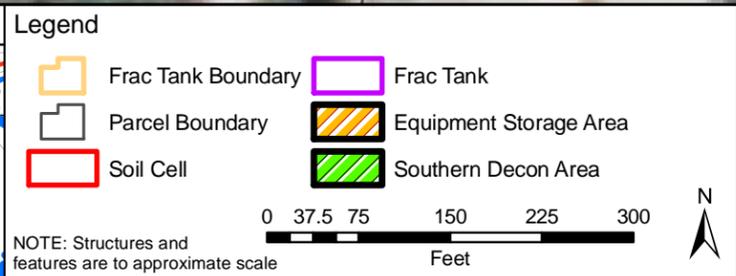
- Frac Tank Boundary
- Parcel Boundary
- Frac Tank
- Equipment Storage Area
- Northern Decon Area
- Southern Decon Area

NOTE: Structures and features are not to scale.

**Figure 2:
CURRENT LAYOUT
FRAC TANK CITY**

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**Figure 3:
FUTURE LAYOUT
FRAC TANK CITY**

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